

Kaspar, Paul

From: Kenneth Teague <kgteague@sbcglobal.net>
Sent: Thursday, August 30, 2018 4:22 PM
To: swg_public_notice@usace.army.mil; 401certs@tceq.texas.gov; jeffrey_hill@fws.gov; Kaspar, Paul; mike.morgan@tpwd.state.tx.us; aaron.chastain@noaa.gov
Subject: FW: SWG-2013-00147

Dear Sir/Ms: Please add the following comment to the comments I sent a few minutes ago:

- A dredged material disposal alternative based on beneficial use to create/restore coastal marsh, would avoid impacts to nearly 200 ac of wetlands, and would benefit an additional large wetland acreage at the BU site. Clearly the applicant did not consider this in their alternatives analysis. Therefore, the 404(b)(1) Guidelines have not been met.

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From: [Kenneth Teague](#)
Sent: Thursday, August 30, 2018 3:52 PM
To: [swg_public_notice@usace.army.mil](#); [401certs@tceq.texas.gov](#); [jeffrey_hill@fws.gov](#); [Kaspar.Paul@epa.gov](#); [mike.morgan@tpwd.state.tx.us](#); [aaron.chastain@noaa.gov](#)
Subject: SWG-2013-00147

Dear Sir/Ms: I have reviewed the subject PN, and I recommend the USACE not permit the proposed project.

- The project proposes to destroy nearly 200 ac of coastal wetlands. Impacts of this magnitude indicate that the environmental impacts will be significant, and therefore, the National Environmental Policy Act requires an Environmental Impact Statement be prepared and provided for public review and comment.
- The applicant implies that disposal of dredged material in the Gulf of Mexico is not an option. This is likely not accurate. I spoke with the manager of the Ocean Dumping Program at EPA, and she didn't know of any reason why the applicant could not continue to dispose of dredged material at the ODMDS. I also reviewed the dredged material testing data, and the dredged material appears to be clean.
- However, while the proposed project is certainly not the best option, it is likely that ocean disposal isn't either. The likely best alternative for disposal of the dredged material, is via beneficial use for marsh creation/restoration. While the applicant appears to have considered, and rejected, several marsh creation alternatives, I question the veracity of the alternatives analysis. Beneficial use of the dredged material, for marsh creation, is almost certainly the most practicable dredged material disposal alternative. It would also have a net positive environmental effect.
- Because I don't believe the applicant correctly evaluated beneficial use dredged material disposal alternatives, they likely have not met the requirements of the 404(b)(1) Guidelines.
- After additional, detailed review, I may provide additional comments.

Sincerely,

Kenneth G. Teague, PWS, Certified Senior Ecologist
2918 Ranch Rd 620 N, #236
Austin, TX 78734

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